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8 Attorneys for United States of America

9 UNITED STATES DISTRICT COURT

10 NORTHERN DISTRICT OF CALIFORNIA

11 OAKLAND DIVISION

12

13 UNITED STATES OF AMERICA, ) Case No. 4:24-CR-00414 JSW  
14 Plaintiff, )  
15 v. ) **DECLARATION OF NIKHIL BHAGAT IN  
16 CASEY ROBERT GOONAN, ) SUPPORT OF GOVERNMENT'S SENTENCING  
17 Defendant. ) MEMORANDUM**  
18

19 I, Nikhil Bhagat, do hereby declare:

20 1. I am an Assistant United States Attorney for the Northern District of California, and I am  
21 assigned to prosecute the above-captioned matter.

22 2. I am informed and believe that the exhibits attached hereto are what they purport to be.

23 3. **Exhibit A** is video surveillance from the University of California, Berkeley depicting  
24 Casey Goonan's firebombing of a University of California police car on June 1, 2024. It will be  
25 manually filed with the Court.

26 4. **Exhibit B** is a redacted version of an FBI FD-302 form dated July 12, 2024 that outlines  
27 the results of the search warrants executed at Goonan's residences on June 17, 2024.

28 5. **Exhibit C** consists of two hand-drawn plans that were located during a search of

1 Goonan's room. It is provisionally filed under seal for the reasons set forth in the Administrative Motion  
2 to Seal.

3       6.     **Exhibit D** is a 24-page pamphlet on Operation Campus Flood, which Mr. Goonan has  
4 admitted to authoring. It is provisionally filed under seal for the reasons set forth in the Administrative  
5 Motion to Seal.

6       7.     **Exhibit E** consists of pictures taken during the course of search warrant executions on  
7 Mr. Goonan's residences on June 17, 2024. This exhibit is provisionally filed under seal for the reasons  
8 set forth in the Administrative Motion to Seal.

9       8.     **Exhibit F** is a summary chart of some of Mr. Goonan's correspondence while in custody  
10 that was prepared by an FBI Special Agent. The chart is limited to those letters that were intercepted by  
11 the jail and provided to the FBI through February 2025. It is provisionally filed under seal for the  
12 reasons set forth in the Administrative Motion to Seal.

13       9.     **Exhibit G** is a true and correct copy of correspondence that Mr. Goonan sent to an  
14 individual in Northampton, Massachusetts. It is dated September 21, 2024. It is provisionally filed  
15 under seal for the reasons set forth in the Administrative Motion to Seal.

16       10.    **Exhibit H** is a true and correct copy of correspondence that Mr. Goonan sent to an  
17 individual in Tucson, Arizona. It is dated November 26, 2024. It is provisionally filed under seal for the  
18 reasons set forth in the Administrative Motion to Seal.

19       11.    **Exhibit I** is a true and correct copy of correspondence that Mr. Goonan sent to an  
20 individual in Riverside, California. It is dated August 6, 2024. It is filed provisionally under seal for the  
21 reasons set forth in the Administrative Motion to Seal.

22       12.    **Exhibit J** is a true and correct copy of correspondence that Mr. Goonan sent to an  
23 individual in Riverside, California. It is erroneously dated January 2024 but was likely written in  
24 January 2025. It is filed provisionally under seal for the reasons set forth in the Administrative Motion to  
25 Seal.

26       13.    **Exhibit K** is a true and correct copy of correspondence that Mr. Goonan sent to an  
27 individual or organization in Chicago, Illinois. It is dated January 15, 2025. It is filed provisionally  
28 under seal for the reasons set forth in the Administrative Motion to Seal.

1       14.   **Exhibit L** is a true and correct copy of correspondence from Mr. Goonan to an address in  
2 Brooklyn, New York. It is dated November 30, 2024, and is filed provisionally under seal for the  
3 reasons set forth in the Administrative Motion to Seal.

4       15.   **Exhibit M** is a true and correct copy of correspondence from Mr. Goonan to an  
5 individual in Philadelphia, Pennsylvania. It is dated October 2024. I understand that officials at the  
6 Santa Rita Jail reviewed this correspondence and declined to forward it to the recipient based on security  
7 concerns. This exhibit is provisionally filed under seal for the reasons set forth in the Administrative  
8 Motion to Seal.

9       16.   **Exhibit N** is a true and correct copy of correspondence from Mr. Goonan to an individual  
10 in Pennsylvania. It is dated February 16, 2025, and is filed provisionally under seal for the reasons set  
11 forth in the Administrative Motion to Seal.

12       17.   **Exhibit O** is a true and correct copy of correspondence from Mr. Goonan to individuals  
13 in San Francisco, California. It is dated December 2024. It is filed provisionally under seal for the  
14 reasons set forth in the Administrative Motion to Seal.

15       18.   **Exhibit P** is a true and correct copy of correspondence from Mr. Goonan to an individual  
16 in Riverside. It is dated February 15, 2025. It is filed provisionally under seal for the reasons set forth in  
17 the Administrative Motion to Seal.

18       19.   **Exhibit Q** is a true and correct copy of correspondence from Mr. Goonan to an individual  
19 in Oakland. It is dated February 17, 2025. It is filed provisionally under seal for the reasons set forth in  
20 the Administrative Motion to Seal.

21       20.   **Exhibit R** is a true and correct copy of correspondence from Mr. Goonan to an individual  
22 in San Marcos, Texas. It is dated February 17, 2025. It is filed provisionally under seal for the reasons  
23 set forth in the Administrative Motion to Seal.

24       21.   **Exhibit S** is a true and correct copy of correspondence from Mr. Goonan to an individual  
25 in Eugene, Oregon. It is dated March 14, 2025. It is filed provisionally under seal for the reasons set  
26 forth in the Administrative Motion to Seal.

27       22.   **Exhibit T** is a true and correct copy of correspondence from Mr. Goonan to an individual  
28 in Fair Oaks, California. It is dated November 13, 2024 and is filed provisionally under seal for the

1 reasons set forth in the Administrative Motion to Seal.

2       23.   **Exhibit U** is a true and correct copy of correspondence from Mr. Goonan to an individual  
3 in Oakland. It is dated November 2024 and is filed provisionally under seal for the reasons set forth in  
4 the Administrative Motion to Seal.

5       24.   **Exhibit V** is a true and correct copy of correspondence from Mr. Goonan to individuals  
6 in Seattle, Washington. It is dated February 28, 2025 and is filed provisionally under seal for the  
7 reasons set forth in the Administrative Motion to Seal.

8       25.   **Exhibit W** is a true and correct copy of an Application for a Search Warrant. It Is filed  
9 provisionally under seal for the reasons set forth in the Administrative Motion to Seal.

10       26.   **Exhibit X** is a true and correct copy of correspondence from Mr. Goonan to an individual  
11 in Riverside. It is dated July 28, 2024 and is filed provisionally under seal for the reasons set forth in the  
12 Administrative Motion to Seal.

13       27.   **Exhibit Y** consists of true and correct copies of redacted versions of correspondence that  
14 Mr. Goonan has sent to a person who works at a legal services organization. Two of the letters were  
15 obtained directly from the legal services organization, and one was obtained via search warrant. The  
16 government is only in possession of redacted versions of this correspondence, but counsel for the  
17 defendant is in possession of unredacted copies. This exhibit is filed provisionally under seal for the  
18 reasons set forth in the Administrative Motion to Seal.

19       28.   **Exhibit Z** is a true and correct copy of an FBI FD-302 record of interview with a witness  
20 who works at a legal-services organization. It is filed provisionally under seal for the reasons set forth in  
21 the Administrative Motion to Seal.

22       29.   **Exhibit AA** is a true and correct copy of correspondence that Mr. Goonan sent to an  
23 individual in Fair Oaks, California. It is dated December 5, 2024. It is filed provisionally under seal for  
24 the reasons set forth in the Administrative Motion to Seal.

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1 I declare under penalty of perjury that the foregoing is true and correct to the best of my  
2 knowledge and belief.

3 Dated at San Francisco, California this 16th day of September, 2025.  
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5 */s/ Nikhil Bhagat*  
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